

EXHIBIT B

AFFIDAVIT OF POLICE COMMISSIONER WILLIAM B. EVANS

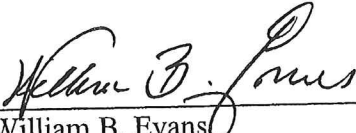
I, Police Commissioner William B. Evans, do hereby depose and state as follows:

1. I have been employed by the Boston Police Department (the "Department") for approximately thirty five years. In October 2013, I was appointed to the position of Police Commissioner for the City of Boston. Prior to my appointment as Police Commissioner, I was assigned as Chief of the Bureau of Field Services.
2. Prior to my appointment as Chief of the Bureau of Field Services, I was assigned from 2006 to 2009 as Captain of the Department's District D-4, which provides police services in the South End and Back Bay neighborhoods.
3. Prior to serving as Captain of District D-4, from 1997 to 2006, I was assigned as Captain of District D-14, which provides police services in the Allston and Brighton neighborhoods.
4. In these roles with the Department, I have participated in and overseen coordination of the operational plan for the Department's policing of public events in South Boston, including the annual St. Patrick's Day parade sponsored by the South Boston Allied War Veterans Council (the "AWV Parade"), the St. Patrick's Day road race sponsored by the Boys and Girls Club of Boston (the "Road Race"), and, since 2011, the St. Patrick's Day Peace Parade sponsored by the Veterans for Peace, Chapter 9, Smedley Butler Brigade (the "VFP Parade").
5. As PC, I am responsible for, among other things, overseeing the Department's Command Staff, which includes reviewing operational plans for the Department's policing of public events in the City of Boston, including the above-referenced events in South Boston.
6. As Chief of the Bureau of Field Services, I was responsible for coordinating and implanting the operational plan for the above-referenced public events in South Boston.
7. As a Captain of Districts 4 and 14, I was assigned to command officers in the area from G Street to L Street in South Boston on the day of the AWV Parade and other events in South Boston.
8. Prior to my appointment as Captain, I was assigned various tasks as a Lt., Sgt. and Patrolmen with respect to policing the AWV Parade in South Boston.
9. I have extensive personal knowledge of the Department's efforts to provide a safe and secure environment for public events in South Boston held to commemorate St. Patrick's Day and Evacuation Day.
10. I am also resident of South Boston and have lived in the neighborhood my entire life.

11. As Police Commissioner, my primary concern with respect to public events is to provide a secure environment for event participants, spectators and other members of the public.
12. Chief among my concerns is to provide thorough and effective counter-terrorism and explosive ordinance detection services to public events. I am concerned about loss of life, prevention of assault and battery, public consumption of alcohol, and public urination.
13. To that end, since I became Police Commissioner, I have reviewed the Department's planning for multiple public events in the City, including parades.
14. After considering the public safety benefits, I made the decision to modify the routes for the Caribbean/J'ouvert Parades in Roxbury, the Allston/Brighton Day Parade, and the First Night Parade in Back Bay.
15. By shortening and modifying the above-referenced parade route, the Department was able to focus more resources in a compact area, and assist traffic flow and emergency vehicle access to these neighborhoods. There is a significant public safety benefit in reducing the length of parade routes, as the Department is able to place more officers along the route, behind the crowds, to monitor potential terrorist activity, violence, public drinking and public urination.
16. In recent years, I have become concerned about providing a safe and secure environment for parade spectators, participants and residents of South Boston.
17. I have witnessed and received reports of assault and battery (including aggravated assault and battery), public alcohol consumption, public urination, and dangerous activity involving individuals congregating on rooftops along the parade route from Department employees and citizens of South Boston.
18. By way of illustration, 2014, the Department issued 293 civil citations for public drinking on the day of the parades in South Boston.
19. In 2015, the AWW Parade route was shortened by approximately 2 miles as a result of the amount of snow on the streets in South Boston (the "Shortened Route").
20. The Shortened Route allowed the Department to provide more effective police services because it was able to concentrate its resources in a more limited geographic area. More officers were assigned to each block of the route, which allowed officers to monitor the crowd more effectively and provide a safer environment. Additionally, the Department was able to respond quickly to incidents due to the closer proximity of specialized units and rapid response teams. In summary, the Shortened Route reduced the Department's vulnerabilities associated with attempting to cover a vast area spanning several miles.

21. The Shortened Route also alleviated the vehicular and pedestrian gridlock in the area surrounding Andrew Square, which in the past several years has impaired emergency vehicle access, and when combined with excessive alcohol consumption, led to violent physical confrontations in the area.
22. As an ancillary benefit, the Shortened Route was also more cost effective for taxpayers of the City. In 2014, the Department assigned over 738 personnel to the parades for overtime cost of \$298,073. In 2015, that number was reduced to 592 personnel for overtime cost \$208,826.
23. Following the 2015 AWW Parade, I received positive feedback from numerous residents of South Boston who were in favor of the Shortened Route. In particular, residents were supportive of the reduced impact on the neighborhood, including the increased flow of traffic.
24. After considering the public safety issues surrounding the parades in South Boston, the security climate in the United States, including the recent history of terrorism in the City of Boston, and the success of the Shortened Route in 2015, I made the decision to use the Shortened Route for both parades in South Boston on March 20, 2016.
25. Over the past several months, I had several discussions with Brian Mahoney of the Allied War Veterans Council in which I communicated my concerns regarding the length of the route, and the benefits the neighborhood and the Department realized from the Shortened Route in 2015.
26. In my opinion, based on decades of experience as a sworn officer, member of the Command Staff and Police Commissioner of the City of Boston, the Shortened Route allows the Department to provide the most secure experience for residents, spectators and parade participants.

SIGNED THIS 15th DAY OF MARCH, 2016, UNDER THE PENALTIES OF
PERJURY.



William B. Evans
Police Commissioner